

FRONTIER LAW CENTER

Robert L. Starr (183052)
robert@frontierlawcenter.com
Karo G. Karapetyan (318101)
karo@frontierlawcenter.com
Manny Starr (319778)
manny@frontierlawcenter.com
23901 Calabasas Road, Suite 2074
Calabasas, California 91302
Telephone: (818) 914-3433
Facsimile: (818) 914-3433

THE MARLBOROUGH LAW FIRM, P.C.

Christopher Marlborough (298219)
chris@marlboroughlawfirm.com
445 Broad Hollow Road, Suite 400
Melville, NY 11747
Telephone: (212) 991-8960
Facsimile: (212) 991-8952

POMERANTZ LLP

Jordan L. Lurie (130013)
jlurie@pomlaw.com
Ari Y. Basser (272618)
abasser@pomlaw.com
1100 Glendon Avenue, 15th Floor
Los Angeles, CA 90024
Telephone: (310) 432-8492
Facsimile: (310) 861-8591

Attorneys for Plaintiff Gor Gevorkyan

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Gor Gevorkyan on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

Bitmain, Inc., Bitmain Technologies, Ltd.
and DOES 1 to 10,

Defendants.

Case Number: 3:18-cv-07004-JD

**JOINT STIPULATION AND
PROPOSED ORDER EXTENDING
TIME TO CONDUCT
JURISDICTIONAL DISCOVERY AND
CONTINUING JURISDICTIONAL
BRIEFING SCHEDULE**

1 Plaintiff Gor Gevorkian and Defendant Bitmain Technologies, Ltd. hereby stipulate and
2 agree as follows:

3 **WHEREAS**, on December 19, 2019, the Court granted leave for Plaintiff to conduct
4 jurisdictional discovery on Defendant for a period of 120 days (ECF No. 44);

5 **WHEREAS**, due to travel restrictions related to the COVID-19 pandemic, the Parties
6 stipulated to allow Plaintiff until July 22, 2021 to take a deposition of a Bitmain witness who is
7 knowledgeable regarding the facts set forth in the Declarations of Luyao Liu (ECF No. 72); and
8 the Court approved the Parties' Stipulation (ECF No. 73);

9 **WHEREAS**, the Court also ordered that Plaintiff could seek additional leave to further
10 extend the deadline to conduct the deposition in the event travel restrictions would not permit a
11 deposition by July 22, 2021 (ECF No. 73);

12 **WHEREAS**, the current travel restrictions are still such that a Bitmain's witness would
13 be required to quarantine for 14 days upon re-entry into mainland China if the witness were
14 required to leave mainland China in order to participate in the aforementioned deposition;

15 **WHEREAS**, recent changes in travel restrictions may now allow entry of certain
16 foreign nationals into the Republic of Korea, subject to certain conditions and government
17 approval;

18 **WHEREAS**, Bitmain is seeking to obtain the necessary approvals from the authorities
19 of the Republic of Korea to allow a Bitmain witness, Yonggang Sun, to be deposed on August
20 4, 2021, at the office of O'Melveny & Myers LLP in Seoul, South Korea;

21 **THEREFORE, THE PARTIES HAVE MET AND CONFERRED AND AGREED**
22 **THAT:**

- 23
- 24 1. The time for Plaintiff to depose a Bitmain witness should be extended by thirty-five
25 (35) days until August 27, 2021;
 - 26 2. The parties will conduct the deposition in Seoul, Republic of Korea, provided that
27 they obtain the approval of the relevant local authorities;
 - 28

- 1 3. The deadline to file simultaneous briefs addressing the issue of specific jurisdiction
2 over the Defendant shall be 30 days after the date that Plaintiff takes this deposition.

3 **NOW, THEREFORE**, the undersigned Parties hereby stipulate and agree, subject to
4 Court approval, that:

- 5 1. The time for Plaintiff to depose a Bitmain witness shall be extended by thirty-five
6 (35) days until August 27, 2021;
7
8 2. The parties shall conduct the deposition in Seoul, Republic of Korea, provided that
9 they obtain the approval of the relevant local authorities;
10
11 3. If Plaintiff is unable to take the deposition by August 27, 2021, because of
12 circumstances beyond his control, Plaintiff may seek additional leave of Court to
13 further extend the deadline to conduct the deposition;
14
15 4. The Parties shall file simultaneous briefs addressing the issue of specific jurisdiction
16 over the Defendant within 30 days after the date that Plaintiff takes this deposition.

17 **IT IS SO STIPULATED**

18 Dated: July 7, 2021

19 /s/ Manny Starr
20 Robert Starr (183052)
21 Karo G. Karapetyan (318101)
22 Manny Starr (319778)
23 FRONTIER LAW CENTER
24 23901 Calabasas Rd, Suite 2074
25 Calabasas, CA 91302
26 Telephone: (818) 914-3433
27 Facsimile: (818) 914-3433
28 E-Mail: robert@frontierlawcenter.com
karo@frontierlawcenter.com
manny@frontierlawcenter.com

Jordan L. Lurie (130013)
Ari Y. Basser (272618)
POMERANTZ LLP
1100 Glendon Avenue, 15th Floor
Los Angeles, CA 90024
Telephone: 310-405-7190

Facsimile: 917-463-1044
E-mail: jllurie@pomlaw.com
abasser@pomlaw.com

Christopher Marlborough (298219)
THE MARLBOROUGH LAW FIRM, P.C.
445 Broad Hollow Road, Suite 400
Melville, NY 11747
Telephone: (212) 991-8960
Facsimile: (212) 991-8952
E-Mail: chris@marlboroughlawfirm.com

Attorneys for Plaintiff

Dated: July 7, 2021

/s/ Jason A. Orr
Carlos M. Lazatin
William K. Pao
Jason A. Orr
O'MELVENY & MYERS LLP
400 South Hope Street
18th Floor
Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407
Email: clazatin@omm.com
Email: wpao@omm.com
Email: jorr@omm.com

Attorneys for Defendant
Bitmain Technologies, Ltd.

ECF CERTIFICATION

Pursuant to Civil Local Rule 5-1, I, Manny Starr, hereby attest that concurrence in the filing of this document has been obtained from all signatories.

DATED: July 7, 2021

FRONTIER LAW CENTER

By: /s/ Manny Starr
Manny Starr